

Clerk  
District Court

NOV 21 2005

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

**JOE HILL**  
HILL LAW OFFICES  
P.O. Box 500917  
Saipan, MP 96950  
Tel.: (670) 234-6806/7743  
Fax: (670) 234-7753

Attorney for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS**

**ABELLANOSA, JOANNA, et.  
al.,**

Plaintiffs,

v.

**L&T INTERNATIONAL  
CORPORATION,**

Defendant.

Civil Action No. 05-0010

**PLAINTIFFS' INITIAL  
DISCLOSURES PURSUANT TO  
FED. R.CIV.P. 26(a)(1) AND LR  
16.2CJ.d**

Date: November 25, 2005

Time: 9:30 a.m.

Judge: Hon. Alex R. Munson

**TO : L&T INTERNATIONAL CORPORATION  
through its Attorney of Record Collin M. Thompson**

Plaintiffs, through counsel, make these initial disclosures as required by  
Federal Rule of Civil Procedure 26(a)(1) and Local Rule 16.2CJ.d.

**A. Individuals with Discoverable Information**

**1. All Plaintiffs**

Address : c/o Joe Hill Law Offices  
Telephone Number : (670) 234-6806; 234-7743

**JOE HILL**  
Attorney at Law  
Hill Law Offices ~ Susupe  
P.O. Box 500917 ~ Saipan MP 96950 ~  
TEL: (670) 234-6806/7743 ~ FAX: (670) 234-7753

JOE HILL

Attorney at Law

Hill Law Offices ~ Susupe

P.O. Box 500917 ~ Saipan MP 96950 ~

TEL: (670) 234-6806/7743 ~ FAX: (670) 234-7753

- 1           2.   **Cory Quin**  
2           Address                                 :   L&T International Corporation  
3   :   Lower Base, Saipan  
4           Telephone Number                     :   Not Available
- 5           3.   **Baby Lopez**  
6           Address                                 :   L&T International Corporation  
7   :   Lower Base, Saipan  
8           Telephone Number                     :   Not Available
- 9           4.   **Ma. Luisa Dela Cruz-Ernest**   Human Resources Manager  
10           Address                                :   L&T International Corporation  
11   :   Lower Base, Saipan  
12           Telephone Number                    :   Not Available
- 13           5.   **Joaquin S. Torres**           Human Resources Director  
14           Address                                :   L&T International Corporation  
15   :   Lower Base, Saipan  
16           Telephone Number                    :   Not Available

### 17                                 **B. Relevant Documents & Tangible Things**

18           1.   The following is a list of documents, data compilations, and tangible  
19           things in Plaintiffs' possession, custody, or control which they may use to support  
20           their claim or defenses.

- 21                                 i.   Copies of Employment Contracts;
- 22                                 ii.   Copies of Consensual Transfer Documents;
- 23                                 iii.   Copies of Conditional Transfer Documents; and
- iv.   Copies of Notice(s) of Termination

          The above-referenced documents will be made available to Defendant, or  
its attorney or authorized representative for inspection and copying.

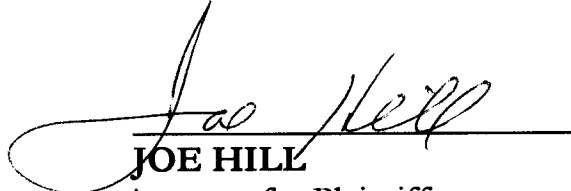
**C. Information Related to Calculation of Damages**

1  
2 1. No comprehensive computation of Plaintiffs' damages is available  
3 at this time. All non-privileged documents on which any computation would be  
4 based will be made available to Defendant, or its attorney or authorized  
5 representative for inspection and copying.  
6

**D. Insurance**

7  
8 1. Plaintiffs do not have copies of any relevant insurances policies.

9 **DATED** this 21<sup>st</sup> day of November 2005.

10  
11   
12 **JOE HILL**  
13 Attorney for Plaintiffs  
14  
15

16  
17 eDC.CA.05.ABELLANOSA.LcT.disclosures/mario  
18  
19  
20  
21  
22  
23